

ATTACHMENT J-2

RESPONSE LETTERS ON NOTICE OF PREPARATION (NOP), RESPONSE LETTERS ON SUPPLEMENTAL NOP, RESPONSE LETTERS ON NOTICE OF INTENT (NOI)

RESPONSES TO THE 2004 NOTICE OF PREPARATION

This attachment contains the following responses to the 2004 Notice of Preparation:

Responses from State Agencies

- California Department of Fish and Game (December 22, 2004, 3 pages)
- California Department of Parks and Recreation (December 21, 2004, 3 pages)
- Native American Heritage Commission (December 9, 2004, 5 pages)
- University of California, Riverside (December 17, 2004, 3 pages)
- California Regional Water Quality Control Boards, Santa Ana Region (December 24, 2004, 5 pages)

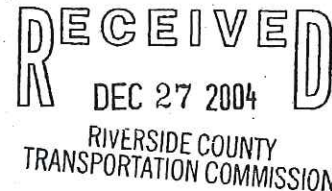
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DEPARTMENT OF FISH AND GAME

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Eastern Sierra-Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
Phone (909) 484-0167
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December 22, 2004



Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92502-2208

Re: Notice of Preparation of Environmental Impact Report, Mid County Parkway Project,
SCH #2004111103

Dear Ms. Bechtel:

The Department of Fish and Game thanks you for the opportunity to comment on the Notice of Preparation for the Mid County Parkway Project. The proposed project extends from the Interstate 15 on the west to State Route 79 on the east in western Riverside County, California. Included in the analysis will be seven build alternatives, of which four are parkway alternatives and three are combination General Plan/parkway alternatives. Many of the alignment alternatives share common segments.

The NOP states that a Natural Environment Study (NES) will be prepared consistent with Caltrans guidelines and will include a literature review, field surveys, jurisdictional waters, fairy shrimp, wildlife movement and habitat connectivity, as well as focused surveys required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Section 15125(d) of the Guidelines for the Implementation of the California Environmental Quality Act requires that an EIR discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. Subsection "f" of Section IV (Biological resources) of the recommended CEQA Initial Study form asks whether the project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved conservation plans.

Planned transportation corridors are discussed in section 7.0 of the MSHCP (Covered Activities/Allowable Uses). CETAP corridors are discussed specifically in Section 7.3.5 of the MSHCP. The document contains provisions for mitigating impacts to and the loss of Public/Quasi-Public Lands within the MSHCP. The document also states that new roadways will be subject to the siting, design and construction guidelines in Sections 7.5.1, 7.5.2 and 7.5.3 of the MSHCP. Impacts to habitat within existing Public/Quasi-Public Lands shall be

compensated by purchase and dedication of land that is in addition to the Additional Reserve Lands.

The MSHCP provides conservation for covered species and habitats. The MSHCP Area Plans provide guidelines for the conservation of quantities of habitat and conservation goals within a particular Area Plan. The Criteria Cells describe the more specific geographic location of conservation lands and include criteria for land to be conserved within a particular cell or group of cells and the biological reasoning behind the criteria. The species objectives provide guidelines and goals for the conservation of individual plants and animals. The MSHCP also provides policies, such as the "Narrow Endemic Plant Species" (Section 6.1.3), "Database Updates/Additional Surveys (Section 6.3), "Riparian/Riverine Areas/Vernal Pools" (Section 6.1.2), and "Urban /Wildlands Interface" (Section 6.1.4). These policies provide additional layers of protection to certain habitats and particular species.

The EIR should include the following:

1. An analysis of the impacts of the alternatives on Existing Public/Quasi Public lands;
2. An analysis of the impacts of the alternatives on existing wildlife reserves;
3. An analysis of the impacts of the alternatives on MSHCP Area Plan goals, Criteria Cells, and Species Objectives;
4. An analysis of the impacts of the alternatives on proposed reserve cores, linkages and constrained linkages;
5. An analysis of how the alternatives conform with "Guidelines for the Siting and Design of Planned Roads Within the Criteria Area and the Public/Quasi-Public Lands" (Section 7.5.1);
6. An analysis of how the alternatives conform with "Guidelines for Construction of Wildlife Crossings" (Section 7.5.2);
7. An analysis of how the alternatives conform with the "Construction Guidelines" (Section 7.5.3);
8. Proposals for mitigating impacts to Existing Public/Quasi Public Lands, core reserves, linkages and constrained linkages;
9. An analysis of the project's consistency with the MSHCP and other impacted HCPs.

The EIR should delineate those areas that are within or outside of the "Criteria Area". For areas outside of the Criteria Area, the analysis should also indicate whether the project is or is not located in one of the special areas, (i.e., the narrow endemic survey area, the additional survey area, the riparian/riverine area or vernal pool policy, the fuels management policy or is at the urban/wildlands interface) and how the project is consistent with these special areas, policies or guidelines.

However, if the project is located within the Criteria Area of the MSHCP, then a more in-depth discussion is required. The EIR biological analysis should include a discussion of the Criteria Cells, specifically, what Criteria Cells are impacted, how the project will impact the cells, both geographically and biologically, and what measures will be taken to bring the project in conformance with the MSHCP cell criteria. The analysis should include a discussion of the impact of the project on the affected Core Area, Linkage or Constrained Linkage. Although the Criteria Area on the map is greater than the 153,000 acres of private

December 22, 2004

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lands required for the MSHCP, in many areas the locations of the cells are geographic-dependent and not contingent on existing biological resources. For instance, a property may be located in a corridor or linkage and the site may have been utilized for farming, ranching or other use whereby the native plant communities have been severely impacted. The fact that the site does not have significant native vegetation does not mean that the cell criteria do not have to be met. If the Criteria Cells are impacted by development then the discussion should include a statement that the lead agency may have to conserve the area within the Criteria Cell or comply with the "Criteria Refinement Process" or "Equivalency" process as described in Section 6.5 of the MSHCP.

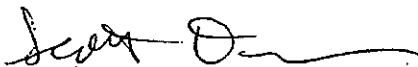
In addition, the CEQA document should indicate whether the proposed development project does or does not fall within one of the special areas of the MSHCP (subsections 6.1.2, 6.1.3 6.1.4 or 6.4). If the project does impact one of these special areas, then there should be a discussion of how the project will comply with the special area policies or guidelines.

In many instances, the status of the consistency of the project with the MSHCP may not be resolved until negotiations with the appropriate lead agency, RCA or Wildlife Agencies. This does not alleviate the responsibility of the lead agency for complying with the provisions of CEQA. For instance, if the project is not consistent with the provisions of the Criteria Cell, then the project is not consistent with the MSHCP. The EIR should state this fact and indicate how the project will be brought into conformance with the MSHCP. If the project is consistent with the MSHCP then the analysis leading to this conclusion should be included in the EIR as well.

Finally, the project site may contain a river, lake, or stream over which the Department has jurisdiction as per Section 1602 of the Fish and Game Code. The Department recommends that a jurisdictional delineation be conducted and that any aquatic resources or vernal pools be identified. If these resources are found on the site, then the applicant should comply with the Riparian/Riverine Areas/Vernal Pool policy. In addition, the applicant should file a 1602 notification with the Department of Fish and Game and comply with other regulatory agency requirements.

The Department looks forward to reviewing the completed Environmental Impact Report. If you have any questions, please call Robin Maloney-Rames, Environmental Scientist, at (951) 980-3818.

Sincerely,



Scott Dawson

Senior Environmental Scientist

cc: U.S. Fish and Wildlife Service – Doreen Stadtlander
Western Riverside County Regional Conservation Authority – Ron Rempel

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70209



State of California • The Resources Agency

Arnold Schwarzenegger, Governor

DEPARTMENT OF PARKS AND RECREATION

Ruth Coleman, Director

Inland Empire District
17801 Lake Perris Drive
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December 20, 2004

Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street
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Riverside, CA 92502-2208

RECEIVED
DEC 21 2004

RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

PostNet Fax Note	Date 12/21	# of pages 3
To Cathy Bechtel		
Fax 951-787-7920		
From Riverside County		
Phone 951-940-5664		

Re: Notice of Preparation for the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Mid County Parkway Corridor Project, SCH No. 2004111103

Dear Ms. Bechtel:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the aforementioned project.

State Parks is a trustee agency as defined by the California Environmental Quality Act (CEQA). State Parks' mission in part is to provide for the health, inspiration, and education of the people of California by preserving the state's extraordinary biodiversity and creating opportunities for high quality outdoor recreation.

As the office responsible for the stewardship of Lake Perris State Recreation Area, we have an interest and concern about potential changes in land use adjacent to the park. Our comments are based on a review of information gathered from Riverside County Transportation Commission, including the Notice of Preparation (NOP), public scoping meeting handouts, and small working group material. The NOP indicates a number of technical studies and investigations that will be conducted in order to furnish information into the Draft EIS/EIR. We understand that those studies will include areas surrounding Lake Perris and will include, but not be limited to, habitat, species, noise, air quality, circulation, recreation, Section 4(f), and any other relevant topics. We are available to discuss these and any other topics of interest.

Our primary concerns involve public safety and circulation. As you may know, Lake Perris experiences periods of peak visitation in the warmest weather days where we may have approximately 8,000 - 10,000 vehicles on a single day, with a significant number of vehicles before 11 a.m. At times, traffic may be stacked on Ramona Expressway from Lake Perris Drive to I-215. With the potential reconfiguration of Ramona Expressway, this may cause the residential neighborhoods south of Ramona Expressway to experience high traffic congestion as vehicles attempt to travel in the vicinity. We welcome you to visit us on Memorial Day, Fourth of July, Labor Day and on extremely hot weather weekends when we tend to experience our highest visitation. If desired, we can arrange a tour on those or other days.

B.1.9.2.1

Ms. Cathy Bechtel
December 20, 2004
Page 2 of 4

Another public safety and traffic circulation concern involves park visitor vehicle access to the Bernasconi area of Lake Perris. With the reconfiguration of Ramona Expressway, accessing the existing Bernasconi entrance road should be as direct as possible eliminating any confusing or circuitous routes taken by park visitors. Residential neighborhoods south of Ramona Expressway may be reluctant to support alignments which bring extremely high volumes of traffic to their vicinity.

We recommend consideration be given to providing measures to reduce impacts to nearby communities and to reduce driver confusion. Such measures may include, but are not limited to,

- signage on the I-215 and Mid County Parkway directing traffic,
- message reader boards to indicate park closure and other pertinent information related to non-Lake Perris traffic conditions,
- adequate stacking capacity on the freeway system, and
- Intelligent Transportation Systems on surface streets to move vehicles efficiently.

In addition, the Draft EIS/EIR should discuss impacts to visitation during construction and measures to mitigate those impacts.

We welcome the opportunity to discuss mitigation options as they relate to impacts to Stephen's Kangaroo Rat Habitat Conservation Plan Reserve, burrowing owls, and other sensitive species, elimination of native vegetation, impacts to wildlife movement, and impacts to recreational resources within Lake Perris.

The Draft EIS/EIR should discuss potential impacts to cultural resources, including numerous archeological sites and the Juan Bautista de Anza National Historic Trail, which crosses Ramona Expressway and runs through Lake Perris.

We suggest expanding the Section 4(f) analysis to include potential direct, indirect, and cumulative impacts to Lake Perris. Impacts may include, but are not limited to, aesthetics, natural resources, short-term and long-term public access, circulation, and impacts to users within the park, such as air quality and noise.

Biological Resources

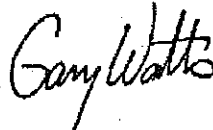
Our staff has observed numerous road kills along Ramona Expressway adjacent to the San Jacinto/Lake Perris Core Reserve over an eight year period. Species from three vertebrate classes have been observed: reptiles, birds, and mammals. Large mammals have included mule deer, coyotes, and bobcats. Coyotes have been the most affected large mammal. Birds have included waterfowl, raptors (American Kestrels and Barn Owls), crows, ravens, and violet-green swallows. The frequency of road kills has steadily increased as traffic on Ramona Expressway has increased.

Ms. Cathy Bechtel
December 20, 2004
Page 3 of 4

We request to review all grading and landscaping plans, especially as they affect resources within or adjacent to Lake Perris. We welcome the opportunity to participate in developing plant palettes for areas adjacent to Lake Perris.

Thank you again for the opportunity to comment and for your serious consideration. For further discussion, please contact me or Enrique Arroyo, District Planner, at (951) 657-0676.

Sincerely,

A handwritten signature in black ink that reads "Gary Watts". The signature is written in a cursive, flowing style.

Gary Watts
District Superintendent

cc: Rick Rayburn, California State Parks
Hector Apodaca, City of Perris

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STATE OF CALIFORNIA

Attorney General Schwarzenegger

Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
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(916) 653-4082
(916) 657-5390 - Fax



December 9, 2004

Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon St, 3rd Floor
Riverside, CA 92502-2208

Re: Proposed Mid County Parkway Project DEIF
SCH# 2004111103

Dear Ms. Bechtel:

Thank you for the opportunity to comment on the above-mentioned document. Early consultation with tribes in your area is the best way to identify Native American cultural resource concerns before a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have unique knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources are that could be affected. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f). Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

Sincerely,


Carol Gaubatz
Program Analyst

Cc: State Clearinghouse

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

B.1.9.2

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Native American Contacts
Riverside County
December 9, 2004

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Gabrielino Tongva

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Mid County Parkway Project, SCH# 2004111103, Riverside County.

December 9, 2004

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Native American Contacts

Riverside County
December 9, 2004

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Native American Contacts
Riverside County
December 9, 2004

Ti'At Society

Cindi Alvitre

6602 Zelzah Avenue

Reseda, CA 91335

(714) 504-2468 Cell

Gabrielino

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VICE-CHANCELLOR--ADMINISTRATION
RIVERSIDE, CALIFORNIA 92521

December 17, 2004

Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
P. O. Box 12008
Riverside, California 92502-2208

RECEIVED
DEC 27 2004
RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

Subject: Notice of Preparation for the Draft Environmental Impact Statement/Environmental Report (EIS/EIR) for the Mid County Parkway Corridor Project

Dear Ms. Bechtel:

Thank you for sending a copy of the above document to the University for review and comment. The University of California, Riverside campus manages a unit of the UC Natural Reserve System, the Motte Rimrock Reserve that is in the vicinity of the project.

The NOP has been reviewed by our Office of Design and Construction and forwarded to John Rotenberry, Director of the Natural Reserve system for the Riverside Campus. The issue areas outlined in the NOP appear to be appropriate. The primary UCR concern is the preservation of the continued viability of the Reserve for research purposes.

Please continue to keep the University of California, Riverside apprised of the progress of this project. The primary contact person will be:

John Rotenberry, Director -- Natural Reserve System
Biology Department
University of California, Riverside,
Riverside, California 92521

(951) 827-3953 (Voice)
Email: john.rotenberry@ucr.edu

Thank you again, and please feel free to contact Tricia D. Thrasher, Principal Environmental Project Manager, on my staff if you need further information.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Michael Webster' with a stylized flourish at the end.
C. Michael Webster
Vice Chancellor of Administration

Cc: Tricia D. Thrasher, Principal Environmental Project Manager

B.1.9.2.1

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12-21-04

14:54

From-Design & Construction

909 787 3890

T-425 P.002/002 F-074

UNIVERSITY OF CALIFORNIA, RIVERSIDE

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SANTA BARBARA • SANTA CRUZ

VICE-CHANCELLOR—ADMINISTRATION
RIVERSIDE, CALIFORNIA 92521

December 17, 2004

Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
P. O. Box 12008
Riverside, California 92502-2208

Subject: Notice of Preparation for the Draft Environmental Impact Statement/Environmental
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Biology Department
University of California, Riverside,
Riverside, California 92521

(951) 827-3953 (Voice)
Email: john.rotenberry@ucr.edu

Thank you again, and please feel free to contact Tricia D. Thrasher, Principal Environmental Project Manager, on my staff if you need further information.

Yours truly,


C. Michael Webster
Vice Chancellor of Administration

Cc: Tricia D. Thrasher, Principal Environmental Project Manager

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12-21-04

14:54

From-Design & Construction

808 787 3880

T-425 P.001/002 F-074

70210

UNIVERSITY OF CALIFORNIA, RIVERSIDE
OFFICE OF DESIGN AND CONSTRUCTION
3815A Canyon Crest Drive
Riverside, California 92507

facsimile transmittal

To: Ms. Cathy Bechrel

Fax: 951/787-7928

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DEC 21 2004

Riverside County Transportation
Commission

RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

From: Tricia D. Thrasher, ASLA

Date: 12/21/2004

Re: Mid County Parkway Corridor NOP

Pages: 2

CC:

☐ Urgent

☐ For Your Review

☐ Please Comment/Reply

☒ For Your Use

Notes:

B.1.9.2.1

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Terry Tamminen
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Santa Ana Region

Internet Address: <http://www.waterboards.ca.gov/santaana>
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 - FAX (951) 781-6288



Arnold Schwarzenegger
Governor

FACSIMILE TRANSMITTAL

DATE: Dec 24, 2004
TO: Cathy Bechtel, Riverside Co. Transportation Comm.
FAX NO.: 951-787-7920
FROM: Glenn Robertson
SENDER'S DIRECT TELEPHONE NUMBER: (951) 782-3259
NUMBER OF PAGES, INCLUDING TRANSMITTAL MEMO: 3
SUBJECT: CEQA Comment letter on Mid-County
Parkway Project

PLEASE CONTACT THE SENDER AT THEIR DIRECT NUMBER WITH ANY QUESTIONS.

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Terry Tamminen
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Santa Ana Region



3737 Main Street, Suite 500, Riverside, California 92501-3348
(951) 782-4130 • Fax (951) 781-6288
<http://www.waterboards.ca.gov/santaana>

Arnold Schwarzenegger
Governor

December 24, 2004

Cathy Bechtel
Riverside County Transportation Commission
P.O. Box 12008
Riverside, CA 92502-2208

NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT AND ENVIRONMENTAL IMPACT STATEMENT (DEIR/DEIS) FOR THE MID-COUNTY PARKWAY CORRIDOR PROJECT, RIVERSIDE COUNTY TRANSPORTATION COMMISSION

Dear Ms. Bechtel:

Staff of the Regional Water Quality Control Board, Santa Ana Region (RWQCB), have reviewed the November 2004 Notice of Preparation (NOP) for the DEIR/DEIS regarding the proposed Mid-County Parkway within western Riverside County, prepared in compliance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). Eight west-east alternative routes were submitted that would connect Interstate 15 (I-15), at Cajalco Road in Temescal Canyon, with State Route 79 (SR-79) in San Jacinto. It appears that the favored alternative would incorporate the existing Ramona Expressway and El Sobrante Road in a route projected to be south of Lake Mathews. We believe that the following comments should be incorporated into the DEIR/DEIS:

The route chosen must be wide enough with sufficient right-of-way to implement the project-wide Best Management Practices (BMPs) and stormwater runoff/collection BMPs required by State Board Order No. 99-06-DWQ, the NPDES permit for "Stormwater Discharges from the State of California Department of Transportation (CALTRANS) Properties, Facilities, and Activities (Statewide CALTRANS Stormwater Permit)." At the conceptual level, the DEIR/DEIS should develop mitigation for freeway runoff pollutants.

We are concerned that the route will cross water bodies or will generate tributary flows to mapped water bodies and more obscure channels that transmit short-term flows. Because this project appears to result in excavation of ("dredging") and/or placement of fill into these "waters of the United States," this project may fall within the jurisdiction of the United States Army Corps of Engineers (USACE) and would require their issuance of a Clean Water Act Section 404 permit. Please contact Jason Lambert of USACE at 213-452-3361 and conduct the necessary studies to establish whether the project falls within USACE jurisdiction. If so, the applicant is advised to promptly apply to this office for a Section 401 Water Quality Certification (Certification) that construction and operation of the project will not adversely affect water quality standards (water quality objectives and beneficial uses) identified in the Santa Ana River Basin Water Quality Control Plan (Basin Plan). Section 401 Certifications are required before a Section 404 permit can be issued. Information concerning Certifications can be found at the Regional Board's website, www.waterboards.ca.gov/santaana/html/401.html

The jurisdictional study (and subsequent USACE staff determination) may find that wetlands or other surface waters are isolated from waters of the U.S. and are therefore outside of federal jurisdiction. These so-called "isolated waters" are nevertheless waters of the State and consequently a project that impacts them may be subject to individual waste discharge requirements pursuant to the California Water Code.

Although Lake Perris, Lake Mathews, and Temescal Creek are the only water bodies identified for potential impacts at this point, we request that any new channel crossings, or proposed revisions to channel crossings, be inventoried in the DEIR/DEIS and during the noted Clean Water Act Sections 404/401 permit application process. Board staff believes that the alignment that least affects water quality standards should be selected over others. Project operation BMPs should be conditioned in the 404/401 permit

Cathy Bechtel

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application process in order to protect aquatic resources, aside from the conservation efforts incorporated in the western Riverside County Special Area Management Plan (SAMP). Further, any such regional BMPs for this project should coordinate with BMPs for other existing projects.

Beneficial uses, including industrial and domestic supply (MUN), groundwater recharge (GWR), and industrial process supply (IND), relate to the chemical integrity of waters of the State. Other beneficial uses, such as wildlife (WILD), rare and endangered species (RARE), and non-water contact recreation (REC2), relate to the physical, biological, and chemical integrity of a waterbody. Since the violation of water quality standards is a significant impact under CEQA, obliterating or impairing beneficial uses through the fill of a waterbody is a significant impact and should be avoided, minimized, and/or mitigated in a manner that is acceptable to the relevant Responsible Agencies, which include the RWQCB, USACE, California Department of Fish and Game (CDFG) and the U.S. Fish and Wildlife Service (USFWS). A reference to a need to obtain necessary permits from those agencies is not adequate or sufficient mitigation. Board staff believes that at this early stage in the CEQA process, steps must be taken to identify acceptable mitigation for unavoidable impacts and that you should not finalize the CEQA process for the project until mitigation agreed to with each agency can be incorporated into the final EIS/EIR.

The EIS/EIR should address cumulative impacts to the above beneficial uses posed by the development of hills and floodplains. The NOP did not address cumulative impacts posed by additional future transportation projects in this area, and the EIS/EIR should address their relationships to the Mid-County Parkway. The EIS/EIR parkway route maps should also include overlays of preserved land for threatened and endangered species agreed upon through the Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP).

The NOP's consideration of wildlife corridors should be supported by measures that mitigate for construction upon natural drainages, in keeping with our Basin Plan's beneficial uses and agreements in the MSHCP. The preservation of natural drainage systems, water bodies, and slopes reduces impacts to water quality and may lessen development's overall impact on water quality standards. Established native riparian vegetation along and within drainage systems, flanked by adequately vegetated upland buffer areas, will capture storm flows and thereby lessen erosion and sedimentation. Additionally, by facilitating wildlife movement through riparian corridors, the Basin Plan's wildlife habitat beneficial uses (in particular, WILD) are served. As generally stated in the NOP, the roadways, pipelines, etc. should be carried over ravines, arroyos, and slope drainages by bridges or wide, arched culverts.

If you have any questions, please contact Glenn Robertson of my staff at (951) 782-3259, or me at (951) 782-3234.

Sincerely,



Mark G. Adelson, Chief
Regional Planning Programs Section

cc: Scott Morgan - State Clearinghouse

Q: Planning/Groberts/Letters/DEIR- Riv Co Trans Comm - Mid County Parkway Project Riv Co





California Regional Water Quality Control Board

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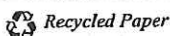
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